

**REMARKS**

Claims 1-24 are pending.

Claims 1-24 stand rejected.

Claims 25-32 are canceled.

Claims 1, 2, and 9-24 are amended. No new matter has been added. Example support for these amendments can be found, at least, within paragraph [0026] of the specification.

Claims 33 and 34 are new. No new matter has been added. Example support for these amendments can be found, at least, within paragraphs [0013], [0016], [0017], and [0026]-[0029] of the specification.

**Objections to the Specification**

The Amendment filed on May 3, 2010 has been objected to because it purportedly introduces new matter. Applicants have amended the claims to address the Examiner's objections. Particularly, the limitations in claim 34 have been written to more closely draw support from, among others, paragraphs [0013], [0016], [0017], and [0026]-[0029] the specification. Thus, Applicants respectfully submit that this objection is overcome.

**Rejection of Claims under 35 U.S.C. § 112**

Claims 1-24 stand rejected under 35 U.S.C. § 112, first paragraph, as purportedly failing to comply with the written description requirement. Applicants have canceled the objected-to limitations in claims 1 and 9. Thus, Applicants respectfully submit that this objection is overcome.

Applicants respectfully submit that the limitations in claim 4 draw support from, at least, paragraph [0021] of the originally-filed specification. Applicants submit that the extraction and conversion of, "some or all inventory location information that is in the source format" (emphasis added) supports the limitation in claim 4 reciting, "the extracting extracts less than all the source inventory location information" (emphasis added). Thus, Applicants respectfully submit that this objection is overcome.

Claims 1-24 stand rejected under 35 U.S.C. § 112, second paragraph, as purportedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Applicants have amended claims 1 and 9 to recite that the “integrating” limitations comprises combining the records from a plurality of source inventory location records. Thus, Applicants respectfully submit that this objection is overcome.

Applicants have amended claims 2 and 10 to address the Examiner’s concerns, and respectfully submit that this rejection is overcome.

Rejection of Claims under 35 U.S.C. § 103(a)

Independent Claims 1 and 9

Claims 1-4, 6-7, 9-12 and 20-22 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U.S. Patent No. 5,446,880 (“Balgeman”), and further in view of U.S. Patent Application No. 2002/0178077 (“Katz”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that neither Coleman nor Balgeman nor Katz, alone or in any combination, teach or suggest, at the very least, (1) integrating inventory location information from a plurality of source systems to synchronize a target system, where such integrating combines at least one record from one of the plurality of source systems and another record from another of the plurality of source systems; and (2) converting the combined inventory location information into target inventory location information.

Applicants respectfully submit that Coleman fails to teach or in any way suggest the newly recited limitations, as well as the existing limitations. The Office Action cites the abstract, Figures 2B and 3, and column 1, lines 9-13 of Coleman as purportedly teaching the claimed “integrating” limitation. Coleman’s abstract discloses that data can be converted between different hardware and software platforms. *See* Coleman Abstract. However, Coleman fails to contemplate anything comparable to integrating a plurality of source systems with a target system by combining source inventory location information extracted from a plurality of sources before converting and sending the combined information to the target. In other words, Coleman performs conversions one at a time and, as one would expect, is completely silent on any method for combining any type of information from multiple sources before converting the combined information into a format for a target system. The remaining cited sections of Coleman also fail to provide any support for the newly recited “integrating”/“combining” limitation. Coleman’s Figures 2B and 3 only provide the system organization for supporting the above-discussed single

source conversion of data. Similarly, column 1, lines 9-13 of Coleman disclose the ability to convert from a number of different formats, with no mention of combining multiple source formats before they are converted.

Applicants submit that Balgeman is cited against claim limitations that have been canceled. Thus, Applicants respectfully submit that Balgeman is no longer relevant to the current claims.

Katz is cited solely for the purported disclosure of inventory location information. *See* Office Action, p. 7. The cited sections of Katz are silent on anything similar to the claimed “integrating”/”combining” limitations. Further, Applicants respectfully submit that Katz cannot be extended to teach or suggest the claimed “integrating”/”combining” limitations because Katz, similar to Coleman, simply performs serial conversions of data in various formats into a different format. Katz fails to contemplate anything comparable to integrating a plurality of source systems with a target system by combining source inventory location information extracted from a plurality of sources before converting and sending the combined information to the target.

#### Dependent Claim 4

In addition to the above distinctions, dependent claim 4 recites further distinguishing limitations. Claim 4 recites that for each of the plurality of source systems from which inventory location information is extracted, less than all of the source inventory location information will be extracted. Particularly, (1) from the record from the first source system, less than all first source system inventory location information is extracted; and (2) from the other record from the second source system, less than all second source system inventory location information is extracted.

Such features provide improved efficiency, based in part on the recognition that not all information from one system will necessarily be needed by another system. For example, in the manner described in the specification, a front-office system might be focused on a function different from that of a back-office system. In such a case, there is no need for both of these systems to synchronize every aspect of their respectively managed inventory location information. Coleman, Balgeman, and Katz are completely silent on a synchronization process that extracts only part of the available inventory location information managed by a plurality of source systems. Thus, there is no way of characterizing Coleman, Balgeman, or Katz as teaching, suggesting, or showing features such as the recited limitations.

Dependent Claim 34

In addition to the above distinctions, dependent claim 34 recites further distinguishing limitations. Claim 34 recites features that are depended on by the “combining” limitation in independent claim 1. Particularly, the combining depends on a first inventory item at a first source system being equivalent to a second inventory item at a second source system. Further, the combining depends on inventory location information comprising inventory item characterization. For example, if two inventory items at two different source locations are equivalent, then the inventory item characteristics can be combined.

Coleman, Balgeman, and Katz generally fail to consider any advantage that might stem from considering any characteristics of the information being migrated from system to system. Without considering any characteristics of the underlying information, these references are incapable of recognizing the possibility of the claimed integration and combination of inventory location information from multiple source systems before converting the combined information for a target system.

Independent Claim 33

Independent claim 33 is new and recites similar limitations to independent claims 1 and 9. However, independent claim 33 introduces additional limitations that further distinguish the claimed limitations from any teachings from Coleman, Balgeman, or Katz. Particularly, claim 33 recites that source inventory location information comprises the source inventory location information units. This additional level of detail highlights why the inventory location information from multiple source systems can be combined – because the underlying information is inventory information which can be characterized by units of inventory. While the cited references operate with inventory information, none of the cited references recognizes any characteristic of the inventory information that allows the inventory information from multiple sources to be combined before being converted to a target system.

Claim 33 recites a further distinguishing limitation, that each source system uses a single format of the plurality of source formats available. This limitation recognizes the practical reality that a source system will often be more efficient if a single format is used. Neither Coleman, nor Balgeman, nor Katz make a similar recognition and restrict a source system to one source format of a plurality of source format available.

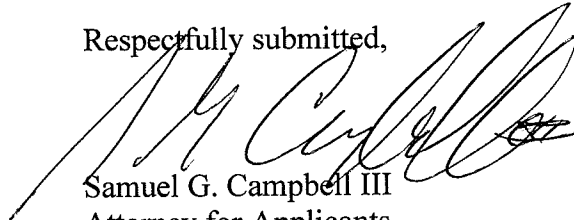
For at least these reasons, Applicants submit that neither Coleman nor Balgeman nor Katz, alone or in combination, provide disclosure of all the limitations of independent claims 1, 9, and 33, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. G. Campbell III', is written over the typed name.

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